

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

LOREN L. CASSELL et al.,

Plaintiffs,

v.

VANDERBILT UNIVERSITY et al.,

Defendants.

Civil Action No. 3:16-cv-02086

Chief Judge Crenshaw
Magistrate Judge Brown

**PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND CASE
CONTRIBUTION AWARDS FOR NAMED PLAINTIFFS**

Under Federal Rules of Civil Procedure 23(h) and 54(d)(2), Plaintiffs move that the Court approve an attorneys' fee award to Class Counsel of \$4,833,333.33 (one-third of the monetary recovery), reimburse Class Counsel's reasonable litigation expenses of \$160,080 and grant incentive awards of \$25,000 each to Class Representatives Loren L. Cassell, Pamela M. Steele, John E. Rice, Penelope A. Adgent, Dawn E. Crago, and Lynda Payne.

Class Counsel bore tremendous risk in order to benefit the Class. In spite of this risk, Class Counsel leveraged their experience in excessive fee litigation to achieve an efficient resolution of this matter, thereby avoiding the delay and expense of years of litigation and substantial risk of non-recovery for the Class. The requested percentage of the settlement fund is comparable to attorneys' fees awards in many similar cases. Based on all of the relevant factors, and for the reasons stated in Plaintiffs' supporting memorandum, Plaintiffs respectfully request that the Court grant this motion.¹

¹ Plaintiffs will submit a proposed order at least 10 days prior to the fairness hearing scheduled for October 22, 2019.

Dated: August 23, 2019

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2019 the foregoing document was filed and served electronically on all parties and counsel of record, including the below counsel for Defendants, via the Court's CM/ECF system. Parties may access this filing through the Court's ECF system.

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